



JENNIFER M. GRANHOLM
GOVERNOR

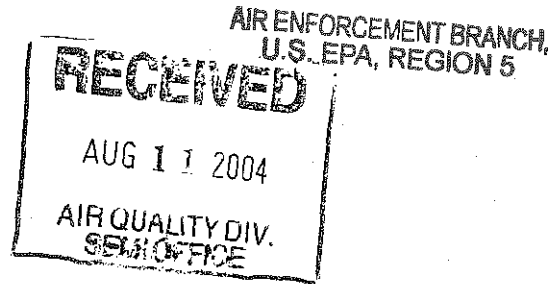
STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



August 9, 2004

MAR 22 2006

Mr. Daniel Taylor
Cargill Salt, Inc.
196 South Riverside Avenue
St. Clair, Michigan 48079-5335



Dear Mr. Taylor:

SUBJECT: Cargill Salt, Inc., St. Clair, Particulate Emission Testing of Boiler 5, Pretzel, Screening, and Duracube, Permit: 199700084, SRN: A6240

The protocol for testing at Cargill Salt, Inc., St. Clair, has been reviewed. This protocol covers particulate emission testing to be performed on Boiler 5, Pretzel, Screening and Duracube stacks. This testing is required by Permit 199700084. Testing will be performed by NTH Consultants, Ltd.

The particulate testing on Boiler 5 will be performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5. The stack diameter will be measured and absence of cyclonic flow will be demonstrated prior to particulate sampling. A soot blow will be performed during one of the test; there will be approximately 12 hours between this test and the previous soot blow. Steam load, coal use, the pressure drop across the mechanical collector, and the pressure drop across the baghouse will be recorded for each run. The continuous opacity monitor 6-minute averages, during each run, will be recorded and included in the test report. The boiler will operate at ninety percent of the maximum load of 100,000 pounds of steam per hour during testing. Three 1-hour runs will be performed.

A coal grab sample will be collected during each run and a composite coal sample produced. This coal sample will be analyzed for sulfur content and BTU. The Air Quality Division (AQD) requests a sample of the coal composite for independent analysis.

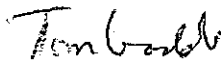
The particulate testing on Pretzel, Screening, and Duracube will be performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1, 2, 4 and 5. The stack diameter will be measured and absence of cyclonic flow will be demonstrated prior to particulate sampling. Pressure drop across the wet scrubbers, the scrubbing liquid flow rate, and the production rate will be recorded for each run. The process will operate at ninety percent of the maximum load. Three 2-hour, 60 dscf, runs will be performed on each stack.

Mr. Daniel Taylor
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The test report will include all pretest and post test meter box calibrations, pitot tube calibration, nozzle calibration, and all field data sheets. The process data and the results of coal analysis will be provided in the report.

Testing is currently scheduled for August 24-27, 2004. Please inform Ms. Teresa Seidel, of the Southeast Michigan District Office, AQD, at 734-953-1413 and me of any change in the test dates. If you have any questions regarding this letter, please contact me by telephone or e-mail at gaslolit@michigan.gov.

Sincerely,



Tom Gasloli
Technical Programs Unit
Field Operations Section
Air Quality Division
517-335-4861

TG:JJM

cc: Mr. Todd Wessel, NTH Consultants, Ltd.
Mr. Christopher Ethridge, AQD



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

RECEIVED

MAR 22 2006

April 9, 2004

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

Mr. Wade Richards
Cargill Salt, Inc.
196 South Riverside Avenue
St. Clair, Michigan 48079-5335

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MAR 22 2006

AIR ENFORCEMENT BRANCH,
U.S. EPA, REGION 5

RECEIVED

APR 13 2004

AIR QUALITY DIV.
ST. CLAIR OFFICE

mamla
AG240

Dear Mr. Richards:

SUBJECT: Cargill Salt, Inc., St. Clair, Boiler 5 Particulate Emission Test, Boiler 10
Annual Relative Accuracy Test Audit, Permit: 199700084, SRN: A6240

The protocol for testing at Cargill Salt, Inc., St. Clair, has been reviewed. This protocol covers particulate emission testing to be performed on Boiler 5 and the annual relative accuracy test audit (RATA) to be performed on the Boiler 10 continuous emission monitoring system (CEMS). This testing is required by Permit 199700084 and Title 40 of the Code of Federal Regulations (CFR), Part 60, Subpart Db. Testing will be performed by NTH Consultants, Ltd.

The particulate testing on Boiler 5 will be performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5. The stack diameter will be measured and absence of cyclonic flow will be demonstrated prior to particulate sampling. A soot blow will be performed during one of the test; there will be approximately 12 hours between this and the previous soot blow. Steam load, coal use, the pressure drop across the mechanical collector, and the pressure drop across the baghouse will be recorded for each run. The continuous opacity monitor 6-minute averages, during each run, will be recorded and included in the test report. The boiler will operate at 100,000 pounds of steam per hour during testing.

A coal grab sample will be collected during each run and a composite coal sample produced. This coal sample will be analyzed for sulfur content and BTU. The Air Quality Division (AQD) requests a sample of the coal composite for independent analysis.

The test report will include all pretest and post test meter box calibrations, pitot tube calibration, nozzle calibration, and all field data sheets. The process data and the results of coal analysis will be provided in the report.

The annual RATA on Boiler 10 will be performed in accordance with 40 CFR, Part 60, Appendix A, Methods 3A and 7E, and Appendix B, Performance Specification 2. The quality control requirements of 6C will apply to 3A and 7E. The RATA will be calculated in terms of pounds of nitrogen oxides per million BTU.

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The test report will include the gas analyzer calibration error, system bias, zero and calibration drift data, all in tabular format. The reference method, and CEM 1-minute averages and run averages, and the operating load as pounds of steam per hour will be included in the report.

Testing is currently scheduled for May 11, 2004 for Boiler 10, and May 14, 2004 for Boiler 5. Please inform Mr. Christopher Ethridge, of the Southeast Michigan District Office, AQD, at 734-953-1462 and me of any change in the test dates. If you have any questions regarding this letter, please contact me by telephone or e-mail at gaslolit@michigan.gov.

Sincerely,

Tom Gasloli

Tom Gasloli
Technical Programs Unit
Field Operations Section
Air Quality Division
517-335-4861

TG:MSM

cc: Mr. Todd Wessel, NTH Consultants, Ltd.
Mr. Christopher Ethridge, AQD ✓